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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:	Chapter 11
BLOCKFI INC., et al.,	Case No.: 22-19361 (MBK)
Debtors. ¹	Jointly Administered
	Judge: Hon. Michael B. Kaplan
	:

APPLICATION FOR ADMISSION OF MICHAEL W. FLETCHER PRO HAC VICE

TO: HONORABLE MICHAEL B. KAPLAN CHIEF UNITED STATES BANKRUPTCY JUDGE

Douglas J. McGill, a member of the bar of this Court, hereby moves for the entry of an Order granting the admission *pro hac vice* of Michael W. Fletcher of Tonkon Torp LLP ("Tonkon Torp") to practice before this Court in connection with the above-captioned cases.

This application (the "Application") is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules"). Unless

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154).

requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the undersigned represents as follows:

- 1. I am an attorney at law of the State of New Jersey, admitted to practice in the United States District Court for the District of New Jersey, among other jurisdictions, and a partner of the law firm Webber McGill, LLC which maintains an address of 100 E. Hanover Avenue, Suite 401, Cedar Knolls, New Jersey, 07927. Webber McGill LLC has been retained to serve as co-counsel, with Tonkon Torp, for the Ad Hoc Committee of Loan Account Holders ("Loan Account Holder Creditors"), as creditors in this matter.
- 2. I submit this Application, pursuant to Civil Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Local Rule 9010-1, in support of the entry of an Order granting the admission *pro hac vice* of Michael W. Fletcher to this Court.
- 3. Mr. Fletcher is an attorney at law and a partner with the law firm Tonkon Torp, which maintains offices at 888 SW Fifth Avenue, Suite 1600, Portland, Oregon 97204.
- 4. Attached hereto is the Certification of Mr. Fletcher in which he certifies that he is, and has been, a member in good standing of the bars of the State of Oregon since 2001, State of Kansas since 1997, and State of Missouri since 1997. Additionally, Mr. Fletcher certifies that he is, and has remained, a member of good standing of said bars at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.
- 5. Mr. Fletcher is familiar with the circumstances surrounding the above-captioned proceedings and applicable law, and his presence will serve the best interest of the Loan Account Holder Creditors.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Michael W. Fletcher to represent the Loan Account Holder Creditors as co-counsel in the above-captioned cases.

Dated: March 28, 2023

/s/ Douglas J. McGill

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